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Attorneys for Defendant
RSKCO SERVICES, INC.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JULIA M. BACKMAN, individually)	CIVIL NO. 04-00348 (HG KSC)
and on Behalf of the ESTATE OF)	(Contract)
DANIEL VERNON BACKMAN, and)	
as Next Friend to KELLY KEIKO)	DEFENDANT RSKCO
VALENE BACKMAN and JODI)	SERVICES, INC.'S EXPERT
LEIGH YACHIYO BACKMAN,)	DISCLOSURES
Minors,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
RSKCO SERVICES, INC., a Illinois)	
corporation; JOHN DOES 1-10;)	
JANE DOES 1-10; DOE)	

PARTNERSHIPS 1-10, DOE)
CORPORATIONS 1-10; DOE)
LIMITED LIABILITY)
ENTITIES 1-10; DOE)
"NON-PROFIT" CORPORATIONS)
1-10; and DOE GOVERNMENTAL)
ENTITIES 1-10,)
)
)
Defendants.)

DEFENDANT RSKCO SERVICES, INC.'S
EXPERT DISCLOSURES

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and the Second Amended Rule 16 Scheduling Order, Defendant RSKCO SERVICES, INC. ("RSKCO") hereby discloses the following experts whose area of expertise is as set forth in their respective curriculum vitae:

1. Robert Kessner, Esq.
19th Floor, Central Pacific Plaza
220 South King Street
Honolulu, Hawaii 96813

Mr. Kessner is anticipated to testify on liability including, but not limited to, the standard of care applicable to a workers' compensation adjuster. Mr. Kessner's opinions, area of specialty, experience and training are attached hereto as Exhibit "1." Mr. Kessner's expert witness fee is \$200 per hour.

2. Ajit Arora, M.D.
Parthenia Medical Group, Inc.
8660 Woodley Avenue
North Hills, California 91343

Dr. Arora is anticipated to testify on liability, causation and

damages including, but not limited to, the fields of toxicology, forensic medicine and internal medicine and the fact that the medications taken by Daniel Backman were not to relieve any industrial related condition. Dr. Arora's opinions and curriculum vitae are attached hereto as Exhibit "2." Dr. Arora's expert witness fee is \$500 per hour.

3. Vert Mooney, M.D.
8660 Woodley Avenue
North Hills, California 91343

Dr. Mooney is anticipated to testify on liability and damages including, but not limited to, the field of surgery and the necessity of surgery at C4-5. Dr. Mooney's opinions and curriculum vitae are attached hereto as Exhibit "3." Dr. Mooney's expert witness fee is \$500 per hour.

4. B. Eliot Cole, MD, MPA
7 Oak Place, Suite 7
Montclair, New Jersey 07042

Dr. Cole is anticipated to testify on liability and damages including, but not limited to, the fields of pain management and psychiatry and the fact that surgery would not have improved Mr. Backman's condition and that Mr. Backman most likely overdosed himself. Dr. Cole's opinions and curriculum vitae are attached hereto as Exhibit "4." Dr. Cole's expert witness fee is \$250 per hour for record reviews and \$500 per hour for deposition and trial testimony.

5. Jerald Udinsky, Ph.D.
2941 Telegraph Avenue
Berkeley, California 94705

Dr. Udinsky is anticipated to testify in the field of economics on Plaintiffs' damages to rebut any expert testimony Plaintiffs may be permitted to offer at the time of trial. Since Plaintiffs' have not produced an economic expert, Dr. Udinsky has not prepared a report. Dr. Udinsky's curriculum vitae are attached hereto as Exhibit "5." Dr. Udinsky's expert witness fee is \$550 per hour for deposition and trial testimony.

In addition to the above-retained expert witnesses, the following physicians, who examined or evaluated Mr. Backman's condition in the workers' compensation case, are anticipated to testify in their fields of expertise concerning their opinions relating to Mr. Backman's condition and surgery at the C4-5 level:

1. Peter E. Diamond, M.D.
932 Ward Avenue, Suite 460
Honolulu, Hawaii 96813
2. Stephen M. Holmes, M.D.
Radiology Associates, Inc.
1329 Lusitana Street, Suite B7
Honolulu, Hawaii 96813
3. Terry G. Smith, M.D.
1329 Lusitana Street, Suite 501
Honolulu, Hawaii 96813
4. Jon Streltzer, M.D.
1356 Lusitana Street, 4th Floor
Honolulu, Hawaii 96813

5. Gregory Chow, M.D.
405 North Kuakini Street, #608
Honolulu Hawaii 96817
6. Matthew Yuh, M.D.
321 North Kuakini Street, Suite #712
Honolulu, Hawaii 96817
7. M. Marc Soriano, M.D.
Associated Neurosurgeons
1021 North Mulford Road, Suite L3
Rockford Illinois 61107
8. John Soong, M.D.
Radiology Associates, Inc.
500 Ala Moana Blvd., Tower 4
Suite 510
Honolulu, Hawaii 96813
9. Felix Song, M.D.
Queen's Medical Center
1301 Punchbowl Street
Honolulu, Hawaii 96813
10. John Cieply, M.D.
John Soong, M.D.
Radiology Associates, Inc.
500 Ala Moana Blvd., Tower 4,
Suite 510
Honolulu, Hawaii 96813
11. James Yamasaki, M.D.
Kapiolani Medical Center at Pali
Momi
98-1079 Moanalua Road
Aiea, Hawaii 96701

12. Daniel Erdman, M.D.
St. Francis Medical Center West
91-2141 Fort Weaver Road
Ewa Beach, Hawaii 96706

DATED: Honolulu, Hawaii, February 15, 2006.

/s/ Edquon Lee

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